

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA)	<u>Filed Under Seal</u>
)	
)	No. 2:19-cr-00013
v.)	
)	Chief Judge Crenshaw
)	
GEORGIANNA A.M. GIAMPIETRO)	

GOVERNMENT’S MOTION TO ADOPT SCHEDULING ORDER

The United States, through the United States Attorney for the Middle District of Tennessee, and the Counterterrorism Section of the National Security Division, U.S. Department of Justice, hereby moves the Court to adopt the following proposed trial schedule with accompanying deadlines. The government believes that the total time needed in court for trial in this case is approximately 2-3 weeks.¹

Trial Date

The government requests that jury selection begin in this case on **Tuesday, August 17, 2021.**

Pretrial Deadlines

The government proposes the following pretrial deadlines in this case:

Rule 16 Discovery

August 28, 2020. Deadline for the government to provide Rule 16 material to the defense.

¹ Pursuant to the Court’s direction at the status conference on September 16, 2019, the government sent this proposed Motion to Adopt Scheduling Order to the defense in the afternoon on October 11, 2019, and asked that the defense notify the government by noon on October 15, 2019 whether the defense had any objections, in whole or in part, to the motion. As of the date and time of the instant filing—approximately 12:30 p.m. on October 15, 2019—the government has received no response from the defense.

CIPA Matters

August 28, 2020. Deadline for the government's CIPA § 4 filing.

Rule 12(b) Motions

January 4, 2021. Deadline for the defense to file Rule 12(b) motions (e.g., motions to dismiss, motions to suppress, etc.).

March 1, 2021. Deadline for the government to respond to Rule 12(b) motions.

March 15, 2021. Deadline for the defense to file replies to the government's responses.

Week of March 29, 2021. Hearing on Rule 12(b)(1) motions.

Expert Notices

January 4, 2021. Deadline for the parties to provide expert notices.

March 1, 2021. Deadline for the parties to file expert-related motions.

March 15, 2021. Deadline for the parties to file responses to expert-related motions.

March 22, 2021. Deadline for the parties to file replies to responses.

Week of March 29, 2021. Hearing on expert-related motions.

Evidentiary Motions

July 5, 2021. Deadline for Rule 404(b) notice and motions in limine.

July 26, 2021. Deadline for responses to Rule 404(b) notice and motions in limine.

August 2, 2021. Deadline for replies to responses.

Jencks

August 3, 2021. Government production of Jencks material to the defense.

Jury Instructions

August 3, 2021. Deadline to submit proposed jury instructions.

Witness List

August 3, 2021. Parties disclose witness lists.

Pretrial Conference

August 9, 2021

Respectfully submitted,

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Dated: October 15, 2019

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2019 I electronically served one copy of the government's Motion to Adopt Scheduling Order with the Clerk of the Court by using the CM/ECF system, which will send a Notice of Electronic Filing to counsel for defendant.

s/Ben Schrader
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